

August 4, 2006

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

As an independent FreeLife International Marketing Executive who has developed my business as a result of the opportunity FreeLife International, its products, and marketing plan made available to me, I am strongly opposed to the new business opportunity rule being promoted by the Federal Trade Commission ("FTC") and others at 16 CFR § 437. The proposed rule seems to be an example of big government interfering with private enterprise and restricting the freedom for average people to legally and legitimately pursue the American Dream.

While the intentions of this bill might be to inhibit some scam businesses, history shows those whose intentions are dishonest will find a way to operate around or in spite of any law. However, legitimate businesses in the Direct Sales industry like FreeLife will be so negatively affected by increased costs, delays, record keeping, disclosures of confidential information, and other burdens that it can damage or destroy the livelihood of thousands of independent businesses like me who are American taxpayers. Here are just a few of the proposal's rulings that I find oppressive and objectionable.

1. Disclosures must be made in a separate pre-printed form, without other materials, and signed by the prospective purchaser, at least seven business days before any contract or payment can be signed or received.

Not only would this requirement severely hamper my ability to do business, I can't think of any other scenario in retail where such restrictions on free enterprise exists. You must understand, we typically build our businesses on relationships, whether they are one-on-one or group meetings. The days of pressuring someone into something are over. If they like what they see, they enroll. If it's not a good fit, they don't. There is no exorbitant up-front cost, just the very reasonable price of the product and business kit. Plus, we have had a very liberal refund, return, and rescission policy in place for over a decade. So, there is virtually no risk to the "purchasers" or need for a seven business-day wait.

2. The requirement of disclosure of the name, city, state, and telephone number for at least 10 prior purchasers nearest to the prospective purchaser's location, or alternatively, a nationwide list of prior purchasers within the last three years.

This proposal doesn't understand the impossible burden the requirement of listing "the ten purchasers nearest to the prospective purchaser's location" prior to enrolling. In this day of working by cell phone, Internet, and email, there are no designated geographic territory limitations on anyone operating a business like ours within America. Therefore, it would be virtually

impossible for us to know, let alone disclose, the contact information for ten purchasers nearest to the enrollee. And even if we could, who wants to make their personal and confidential information public in this day of rampant identity theft?

3. Earnings claim disclosure that any direct or indirect claim about income, including disclosure of the name of the person making the claim, date of earnings, number, and percentage of all purchasers during the time period that received the same earnings, etc.

If this ambiguous guideline means I would have to post the names of everyone that made incomes similar to mine during any given period, I don't know how I could possibly supply that information. Taking it a step further, if "indirect claim" means I have to try to provide that same

unavailable information every time I showed a photo of my home, car or family vacation, I'd be even more restricted in doing a legitimate business. I don't see the real estate or other sales businesses having to supply this finite information when they publish their top producers. Why should I be singled out?

4. Disclosure of all "Legal Actions" for past 10 years, regardless of relevancy, outcome or merit.

This proposed rule would require me to disclose all legal actions regardless of outcome over the past ten years. That would include civil court cases and arbitrations, all governmental actions including criminal matters, and administrative law actions, including cease and desist orders or assurances of voluntary compliance. It also could mean any legal proceedings potentially unrelated to the business or any that were dropped or favorably resolved. As a simple business owner, I hope I never have any legal actions against me. But in this day and age where anyone can sue anyone for anything, I can imagine it happening to an honest business person like myself. So instead of being "innocent until proven guilty" of anything, I'd have to publish that I'm being accused?

5. Disclosure of cancellation or refund policy, the total number of oral or written cancellation or refund requests, over the prior two years, regardless of whether or not the request was proper.

Please understand how our business works. We enroll a lot of people who try the product or work the business opportunity. For many, it is a godsend. For some, it doesn't quite fit, so they cancel and can get their money back. It's that simple. However, since we are an international company, those numbers of people who cancel can grow into thousands. So, providing such statistics would be an impossible burden on me or anyone who works a legitimate business like ours.

So, for this and many other reasons, I urge you to vote against this incredibly restrictive proposal that would hinder, if not crush the American dream it offers people like me. Please vote to leave our American freedoms intact.

Sincerely,

Jennifer Wilding